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8 Attorneys for Defendants
SFPP, L.P., Kinder Morgan Operating L.P. "D," and
Kinder Morgan G.P., Inc.
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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF ARIZONA**
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13 James Paul Mooney; and Lazy Coyote RV
14 Village, LLC, on behalf of themselves and
all others similarly situated,

15 Plaintiffs,

16 v.

17 Union Pacific Railroad Company,
18 successor to Southern Pacific
Transportation Company; SFPP, L.P.
(formerly known as Santa Fe Pacific
19 Pipelines, Inc., formerly known as
Southern Pacific Pipelines, Inc.); Kinder
20 Morgan Operating L.P. "D"; and Kinder
Morgan G.P., Inc.
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22 Defendants.
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LEAD CASE NO. 2:15-cv-01092-
DGC (Consolidated with Case No.
2:15-cv-01380-DGC)

**KINDER MORGAN'S NOTICE OF
SERVICE OF KINDER MORGAN'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' NOTICE OF DEPOSITION,
SECOND SET OF INTERROGATORIES,
AND SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS**

Honorable David G. Campbell

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that, pursuant to LRCiv 5.2, Defendants SFPP, L.P.,
 3 Kinder Morgan Operating L.P. “D,” and Kinder Morgan G.P., Inc. (collectively “Kinder
 4 Morgan”), file this Notice of Service informing the Court that, on November 15, 2017,
 5 Kinder Morgan served its Responses and Objections to Plaintiffs’ Notice of Videotaped
 6 Deposition of the Kinder Morgan Defendants Pursuant to Fed. R. Civ. P. 30(b)(6), and on
 7 December 11, 2017, Kinder Morgan Served its Responses and Objections to Plaintiffs’
 8 Second Set of Interrogatories and Second Request for Production of Documents on Plaintiffs
 9 James Paul Mooney and Lazy Coyote RV Village, LLC (collectively, “Plaintiffs”) and
 10 Defendant Union Pacific Railroad Company (“Union Pacific”), through their counsel of
 11 record.

12
 13 Dated: December 12, 2017

COOLEY LLP

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 15 /s/ M. Ray Hartman III

16 Steven M. Strauss (*Admitted Pro Hac Vice*)

17 M. Ray Hartman III (*Admitted Pro Hac Vice*)

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18 Attorneys for Defendants

19 SFPP, L.P., Kinder Morgan Operating L.P. “D,”
 20 and Kinder Morgan G.P., Inc.

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